	ES DISTRICT COURT MASSACHUSETTS	111 01 FULTED 17710 T 1826 JAN 20 PH 1: 46	
UNITED STATES OF AMERICA)		
v.) Case No. 14-	Case No. 14-CR-10227-PBS	
CAMERON LACROIX)))		

<u>DEFENDANT'S RESPONSE TO GOVERNMENT'S MOTION FOR EXTENSION OF TIME</u>

The Defendant does not oppose the Government's request to extend to January 23, 2026 and will consent to an additional week beyond if needed. Attached to this motion are three exhibits in support of his request.

Exhibit A

1. An e-mail between Defendant and former Chief of United States Probation Mr. Christopher Maloney dated January 29, 2019:

In this exchange Mr. Maloney told the Defendant that the Court was the only one authorized to release Probation records. No petition had been filed as the Defendant's attorney was not interested in pursuing matters related to misconduct prior to his 2019 revocation. The Defendant believes that the Court has the discretion to disclose based upon a strong particularized need. *United States v. Kravetz*, 706 F.3d 47, 56–60 (1st Cir. 2013); *United States v. Figurski*, 545 F.2d 389, 391–92 (1st Cir. 1976).

Exhibit B

2. An "Application for A Search Warrant" which was used to seize location data related to Defendant's Cellular Telephone (19-mj-4021-DHH).

According to Page 5 Paragraph 19 a Special Agent of the FBI swore to Magistrate Judge David H. Hennessy that the following statement was true "the fact that several of the transaction occurred in New Bedford—where Lacroix's family resides and where he has told probation he visits—contributes to the probable cause that he was responsible for the purchases and withdrawals.". The application was approved on February 8, 2025 and the statement directly factored into the probable cause analysis.

Exhibit C

3. An excerpt of "Probation Form 45 titled Treatment Services Referral" (pg 1, 2, and 5)

The Defendant was referred for a Substance Use Evaluation in 2019 and this document was placed into his Probation File. He received the form from the evaluator upon request and this submission has been reducted to shield personal information also noted in his presentence report.

The form assembled by his Probation Officer on February 13, 2025 correctly states on Page 5 that the Defendant's parents live in Fairhaven and that he visits weekly. However, the FBI claimed in a search warrant that this same Probation Officer stated that they lived in New Bedford, where a crime allegedly took place, and that he visits weekly.

Dated:1/20/2026 CAMERON LACROIX

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CERTIFICATE OF SERVICE

I certify that on 1/20/2026 I delivered the foregoing document to the clerk for electronic filing which shall be available for viewing and downloading from the Court's CM/ECF system. All participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

January 20, 2026

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